

201-14458



NCIC HPV

Sent by: Mary-Beth
Weaver

05/13/2003 09:11 AM

To: NCIC HPV, moran.matthew@epa.gov

cc:

cc:

Subject: Merisol -- Mixed Xylenol Category



Barbara Christianson <BChristianson@lawbc.com> on 05/12/2003 04:53:25 PM

To: Christine Whitman/DC/USEPA/US@EPA

cc: Richard Hefter/DC/USEPA/US@EPA, "Kenneth P. Morgan" <ken.morgan@merisol.com>, "oppt.ncic@epa.gov" <oppt.ncic@epamail.epa.gov>, Rtk Chem/DC/USEPA/US@EPA, "Lisa M. Campbell" <LCAMPBELL@lawbc.com>

Subject: Merisol -- Mixed Xylenol Category

Appended is Merisol's proposed category and test plan for the Mixed Xylenol Category as part of its commitment under EPA's HPV Challenge Program. Please let us know if you have any questions.

<<99LT007_.doc>> <<RevisedMXMay_.doc>>

Barbara Christianson

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MAY 13 7:10:57



MERISOL USA LLC
1914 Haden Road
Houston, Texas 770015
(713) 428-5400 ☐ Fax (713) 455-0276

May 12, 2003

Via E-Mail and Regular Mail

The Honorable Christine Todd Whitman
Administrator
U. S . Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

RECEIVED
MAY 13 11:10:56

Re: HPV Challenge Program Submission by Merisol --
EPA Registration No.

Dear Administrator Whitman:

On July 29, 2002, Merisol USA LLC (Merisol) submitted its proposed category approach and test plan for the Mixed Xylenol Category as part of its commitment under EPA's High Production Volume (HPV) Challenge Program. The Mixed Xylenol Category consists of the following six chemicals:

2,5-xylenol (CAS No. 95-87-4)
3,4-xylenol (CAS No. 95-65-8)
2,4-xylenol (CAS No. 105-67-9)
3,5-xylenol (CAS No. 108-68-9)
2,3-xylenol (CAS No. 526-75-0)
2,6-xylenol (CAS No. 576-26-1)

Merisol received comments from EPA in a letter dated December 20, 2002. Appended are the Mixed Xylenol test plan and robust summaries, which have been revised to incorporate the comments from EPA. The major changes that have been made to the appended document include:

- **Test Substance:** At EPA's request, Merisol has modified the test mixture to more closely resemble a Merisol product. The revised test plan indicates our intent to test a mixture containing portions of xylene isomers normalized to match the ratios of xylene isomers occurring in the actual Merisol commercial product containing the highest percentage of all six xylenes.
- **Robust Summaries:** Merisol has prepared additional robust summaries which are appended to the test plan.



The Honorable Christine Todd Whitman
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- **Cresols:** The revised test plan includes a further explanation for Merisol's discussion of the cresols data to ensure it is clear that we are not relying on the cresols data for conclusions about mixed xylenols with regard to HPV testing requirements.
- **Testing Proposal:** Merisol has modified its testing proposal, as recommended by EPA, with regard to physicochemical properties, biodegradation, photodegradation, hydrolysis, fugacity, ecological effects, and acute and genetic toxicity testing.
- **Environmental Fate:** Merisol has added an environmental fate section to discuss biodegradation and possible direct photodegradation.
- **Corrections:** Merisol has corrected values for boiling points, melting points, octanol/water partition coefficient, vapor pressure, and biodegradation.

This submission is also being sent electronically to the following e-mail addresses:

oppt.ncic@epa.gov
chem.rtk@epa.gov

Thank you for your assistance in this matter. If EPA requires any additional information, please contact Lisa Campbell at (202) 557-3802 or lcampbell@lawbc.com.

Sincerely,

Kenneth P. Morgan
Manager Technical Support Services
Merisol USA LLC

Attachment

cc: Mr. Richard H. Hefter, Jr. (w/attachment) (via e-mail)